



INTEROFFICE CORRESPONDENCE

DATE: February 15, 1995

TO: J. D. Raffaldi, Deactivation Field Coordinator, Building 080, X8567

FROM: G. D. Guinn, Environmental Policy & Regulatory Integration, Bldg. 080, X8661

SUBJECT: HANDLING OF 889 BUILDING DOMESTIC WATER THAT ENTERED THE SUMP - GDG-003-95

DOE Order: 5480.2

Action: No action

The following is an environmental assessment of the regulatory status and the required actions to yesterday's domestic water spill. The domestic water that entered the interim status Resource Conservation and Recovery Act (RCRA) sump should be sampled as soon as possible. The liquid level of the sump should be monitored for change, as an indication that no spills through the sump are ongoing to the environment. The liquid should be removed as soon as possible. The water that did not enter the sump should be tested for radiological concerns.

Regulatory concern created by the domestic water spill into the sump deals with the issue of whether there is hazardous waste in the sump. The secondary issue is did the water mix with a RCRA listed sludge. First determine if the sump has sludge from the previous operations for which we have process knowledge that a RCRA Subpart D constituent was utilized or if a listed product was dumped into the sump. If either is true by 261.3(a)(2)(iii-iv), this is a hazardous waste and should be identified by those constituents. If the sump has sludge that contains characteristic waste identified in Subpart C, then sample by Toxicity Characteristic Leaching Procedure (TCLP) for the constituents and follow 261.4(b)(7). If the sump does not have sludge by process knowledge then this is solid waste. Check the waste acceptance criteria for the sanitary treatment plant and if it meets their requirements, then send it to them.

These steps need to be followed. To just identify the water as hazardous waste may be an accountability issue with the Department of Energy.

kld

cc:

L. A. Gregory-Frost *LAG*
K. G. Peter
ERPD Project File (2)